

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 2:16-cv-12146
)	Hon. Paul D. Borman
STATE OF MICHIGAN AND)	Maj. Judge Mona K. Majzoub
MICHIGAN DEPARTMENT)	
OF CORRECTIONS,)	
)	
Defendants.)	
)	
)	

**JOINT STATEMENT REGARDING STATUS OF
SETTLEMENT AGREEMENT**

Pursuant to this Court's Orders, *see* ECF Nos. 66, 75, 80, Plaintiff United States of America and Defendants State of Michigan and Michigan Department of Corrections hereby submit this joint statement on the status of the settlement agreement in this case.

The parties continue to work on the details of the agreement. Due to the shutdown of the federal government from December 22 to January 25, the parties were unable to engage in any settlement discussions during that time period. Since the federal government has reopened, the parties have resumed work on the agreement.

Dated: February 11, 2019

Respectfully submitted,

DELORA L. KENNEBREW
Chief, Employment Litigation Section
Civil Rights Division
U.S. Department of Justice

CLARE GELLER (NY Reg. No. 4087037)

/s/ Lisa Wilson Edwards

TARYN WILGUS NULL (D.C. Bar No. 985724)
LISA WILSON EDWARDS (D.C. Bar No. 421480)
NADIA E. SAID (D.C. Bar No. 1016598)
JENNIFER M. SWEDISH (D.C. Bar No. 977746)
Senior Trial Attorneys
Employment Litigation Section
Civil Rights Division
U.S. Department of Justice
601 D Street, N.W., PHB 4520
Washington, D.C. 20579
Tel: 202-514-5695
Fax: 202-514-1105
Email: Lisa.W.Edwards@usdoj.gov

SAIMA S. MOHSIN
Attorney for the United States
Acting Under Authority Conferred by 28 U.S.C. § 515
Eastern District of Michigan

/s/ Susan K. DeClercq

SUSAN K. DECLERCQ (P60545)
Assistant United States
211 W. Fort Street, Suite 2001
Detroit, Michigan 48226
Tel: 313-226-9149
Email: Susan.DeClercq@usdoj.gov

Counsel for Plaintiff

/s/ Jeanmarie Miller

JEANMARIE MILLER (P44446)
SCOTT A. MERTENS (P60069)
BRYAN W. BEACH (P69681)
Assistant Attorneys General
Attorneys for Defendants, State of Michigan
and Michigan Department of Corrections
Michigan Department of Attorney General
Civil Litigation, Employment & Elections
525 W. Ottawa Street, 5th Floor
P.O. Box 30217
Lansing, Michigan 48909
Tel: 517-335-7659
Fax: 517-335-7640
Email: MillerJ51@michigan.gov

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2019, I electronically filed the above document(s) with the Clerk of the Court using the ECF system, which will provide electronic copies to counsel of record.

/s/ Lisa Wilson Edwards
LISA WILSON EDWARDS
(D.C. Bar No. 421480)
Senior Trial Attorney
Attorney for Plaintiff United States of America